

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

S1 10 CR 60 (RJD)

-against-

MOHAMMED ZAZI
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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed declarations of Deborah A. Colson, Esq., Mohammed Zazi and Sultan Bibi Zazi, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, MOHAMMED ZAZI, will move before the Honorable Raymond J. Dearie on May 12, 2011, or as soon thereafter as counsel may be heard, for an order:

- (a) Dismissing Counts One, Four, Six, Seven and Eight for lack of venue;
- (b) Directing the Government to dismiss duplicative charges;
- (c) Suppressing Mr. Zazi's alleged statements to the FBI on September 16 and September 18, 2009;
- (d) Suppressing physical evidence seized from Mr. Zazi's home and person on September 16 and 17, 2009, and February 1, 2010;
- (e) Compelling the government to provide a bill of particulars and additional items of discovery pursuant to Fed.R.Crim.P. 16 and *Brady v. Maryland*, 373 U.S. 83 (1963);
- (f) Leave to file additional motions as and if they become appropriate in light of further discovery; and
- (e) Any such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 18, 2011

A handwritten signature in black ink that reads "Deborah Colson". The signature is written in a cursive style with a large, sweeping initial "D".

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To: UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK